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March 9, 2015

VIA ECF AND FACSIMILE (212) 805-4268

Hon. Gabriel W. Gorenstein
United States District Court, Southern District of New York
500 Pearl Street, Courtroom 6B
New York, New York 10007-1312

Re: *Ojeda v. Viacom, Inc., et al*, No. 13-CV-5658

Your Honor:

This firm is counsel for Defendants in the above referenced action. On behalf of all parties, I write in reference to Docket Entry #93, which schedules a settlement conference before the Court on March 13, 2015. As set forth in the January 20, 2015 letter filed by counsel for Plaintiffs (Docket #92), the parties have agreed to the terms of a settlement in principle. Counsel for Plaintiffs have advised that they anticipate filing documents in support of their motion for preliminary approval of the terms of that settlement (the "Motion") by Wednesday, March 11. Defendants do not anticipate interposing an opposition to the Motion. Accordingly, on behalf of all parties, we respectfully request that the March 13 settlement conference be converted to an opportunity for the Court to address Plaintiff's anticipated motion.

We thank the Court in advance for its attention to this request.

Very truly yours,

Davis Wright Tremaine LLP

A handwritten signature in black ink, appearing to read "Michael Goettig".

Michael Goettig

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